

**ESTATE OF KENNETH ANDERSON,
JR., *et al*,**
Plaintiffs,

and

EVELYN FAY AYERS-WOODS, *et al*,
Intervenors,

v.

HARRIS COUNTY, TEXAS, *et. al*,
Defendants.

DEFENDANT CRISTAL ESTRADA’S MOTION TO FILE UNDER SEAL

Defendant Cristal Estrada files this Motion to File Under Seal video evidence of the incident involving the arrest of Kenneth Anderson that is the subject of this case and would respectfully show the Court as follows:

Cristal Estrada submits three body camera videos (videos 84, 85 and 86) which record her actions and involvement in the October 10, 2021 incident. In their First Amended Complaint Plaintiffs repeatedly reference body worn camera images and sounds. Because the videos are labeled confidential, Estrada respectfully requests the Court file the videos under seal. The three videos are **Exhibit 1** to Estrada's Motion for Judgment on the Pleadings filed April 14, 2023 [Document 163-1]. This Motion is filed in accordance with this Court's Procedure 5(d). A copy of the videos is being hand delivered to the Court on a USB drive.

Plaintiffs and Intervenor are opposed to this motion.

CONCLUSION & PRAYER

Because the videos are labeled confidential, Estrada respectfully requests the Court place this evidence under seal. Estrada seeks such other and further relief to which this Court finds her to be entitled.

Respectfully submitted,

OF COUNSEL:
CHRISTIAN D. MENEFEE
TEXAS BAR NO. 24088049
HARRIS COUNTY ATTORNEY

Date: April 14, 2023.

By: /s/ Jim Butt
Assistant County Attorney
ATTORNEY-IN-CHARGE
State Bar No. 24040354
Fed. Bar No. 725423
1019 Congress
Houston, Texas 77002
Tel.: (713) 274-5133 (direct)
james.butt@harriscountytexas.gov

**ATTORNEY FOR DEFENDANT
CRISTAL ESTRADA**

CERTIFICATE OF CONFERENCE

I certify that, on April 11, 2023, I emailed counsel and inquired whether they would oppose this Motion to File Under Seal. Counsel for Plaintiffs opposes, and Counsel for Intervenors advised they are sharply opposed.

/s/ James C. Butt
James C. Butt

CERTIFICATE OF SERVICE

I certify that, on April 14, 2023, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this certificate is attached was filed with the clerk of the court using CM/ECF system, which will send electronic notification for those listed of record who receive electronically filed documents:

Allen Zwernemann
Christine Herron
David Adler
Eman Katbi
George Edwards
Ricardo Navarro
Richard Kuniansky
Robert Ford
Stephany Simien

/s/ James C. Butt
James C. Butt